

MEMO ENDORSED

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March 27, 2020

Hon. Kenneth M. Karas
United States District Court
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Margaret Flood*
20 Cr. 119 (KMK)

Dear Judge Karas:

This is an application, on consent of the government and Pretrial Services, to modify the terms of bail now that Ms. Flood has effectively completed her inpatient substance abuse treatment so as to permit her to engage in outpatient treatment as recommended by Pretrial while living with her mother and stepfather at their Sparrowbush, New York home.

On October 1, 2019, Ms. Flood appeared in court for an initial appearance before Magistrate Judge Lisa Margaret Smith and bail was set as follows:

- \$50,000 PRB cosigned by 1 FRP
- Travel restricted to SDNY/NDNY (for inpatient)
- Pretrial Services supervision as directed
- SA Testing/Treatment as directed (to include inpatient SA treatment)
- Not to possess a firearm, destructive device or any other dangerous weapon
- No drug use
- Surrender passport/make no new applications for travel documents
- No contact with codefendants

Judge Smith further ordered Ms. Flood to be detained until all conditions were met including admittance into inpatient facility; upon completion of treatment, return to court for bail hearing to reassess conditions of release.

After satisfying the remaining conditions for release, Ms. Flood entered Samaritan Village's Meadow Run SA treatment program in Rhinebeck, New York on

October 17, 2019. Margaret Flood has successfully completed the inpatient program. I am informed by her counselor there that she is ready for release to an outpatient program, Restorative Management, and that a phone screening appointment has been scheduled for April 6, 2020. I am informed that Restorative Management will require a mix of in person meetings and phone sessions.

We ask that, in light of the current national emergency, the requirement of a bail hearing be waived and for the Court to order the substitution of outpatient treatment as recommended by Pretrial Services be substituted for inpatient treatment on or after April 6, 2020 as conditions may permit. Pretrial Services and the government join in this application with the understanding that the other requirements of release will remain in place.

Very truly yours,

/s/
RICHARD D. WILLSTATTER

cc: Lindsey Keenan
Assistant US Attorney
(by ECF)

Cynthia Labrovic Diaco
Supervisory U.S. Pretrial Services Officer
(by email)

SO ORDERED


KENNETH M. KARAS U.S.D.J.

3/28/2020